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**BEFORE THE
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, D.C.**

IN RE:

QUEEN AIR, AERONAVES QUEEN, S.A.

Application for Renewal of Exemption Authority

DOCKET: OST 1998-4601 - 8

DEC 13 10:12

RECEIVED

**OPPOSITION OF AIR SANTO DOMINGO, S.A. , SERVICIOS AEREOS
PROFESIONALES, S.A. , SERVICIOS AEREOS PROFESIONALES, INC. AND
TRANS CARIBBEAN AIRWAYS, INC. TO THE RENEWAL OF EXEMPTION
AUTHORITY TO QUEEN AIR, AERONAVES QUEEN, S.A**

COMES NOW, all the above mentioned air carriers and formally pray;

1. That the above air carriers are opposing that the Department renew the Exemption Authority to conduct Foreign Air Transportation between the United States and several other countries, and to be allow to file our opposition base on that we were not serve with a copy of the application when Queen Air know that we are an affected parties to its application, and we were never served..

2. That Queen Air is requesting a renewal of its exemption authority when in fact the company do not comply with the Requirements of the Dominican Republic to hold an Air Carrier Certificate.

3. That Queen Air has not conducted any operations within the last three to four years.

4. That Queen Air does not have an airplane that belong to the company, nor leased in its Dominican Republic Air Carrier Certificate to conduct any operations.

5. That in its own application for renewal Queen Air stated that "Queen Air is currently not operating to the U.S.," when in fact Queen Air is not and have not operated nor in the U. S. but in fact within the Dominican Republic it self. (See item 3 of Queen Air application)

6. That Queen air does not have a lease aircraft nor they own an aircraft nor they have an aircraft to operate.

7. That in its own Application Queen Air stated " Queen Air continues to be fit, willing, and able to operate the scheduled combination services referred to herein". How come an Air Carrier that has not being operating for several years, that do not own or have an airplane operated, that do not have a wet lease agreement at this moment nor for the last several years, can continue to be fit, willing and able?

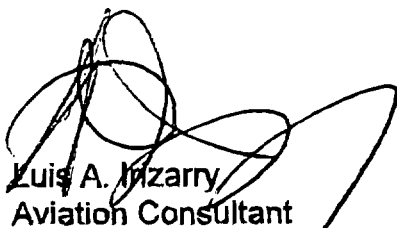
8. That Queen Air is providing incorrect information to the Department in respect to its current condition.

9. That in fact what Queen Air is doing, is trying to mislead the Department to obtain the renewal of its Exemption to be able to sell the company to another party. (See exhibit 1).

10. That the Civil Aviation Authority of the Dominican Republic renewed Queen Air Carrier Certificate when they knew that Queen Air do not qualify to hold an Air Carrier Certificate as prescribed in the RAD's. (Reglamento Aeronautico Dominicano Part 119, Part 121).

WHEREFORTH, the undersigned as representative of the Air Santo Domingo, S.a., Servicios Aereos Profesionales, S. A. , Servicios Aereos Profesionales, Inc. and Trans Caribbean Airways, Inc. , formally opposed to Queen Air Renewal of its Exemption.

Respectfully submitted this 13 th day of December 2002.



Luis A. Irizarry
Aviation Consultant

CERTIFICATE OF SERVICE

I hereby certify that I have on this day served the foregoing opposition to application for renewal its exemption authority by fax and first class mail, postage prepaid, upon the persons shown in the following service list.



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ORIGINAL

BEFORE THE
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, D.C.

DEPT. OF TRANSPORTATION
OFFICE

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Application of

Queen Air, Aeronaves Queen, S.A.

For Renewal of Exemption Authority to Engage
in Scheduled Air Transportation of Persons,
Property and Mail Pursuant to 49 U.S.C. §40109

(Dominican Republic-U.S. Scheduled Combination)

Docket OST-98-4601 - 7

APPLICATION FOR RENEWAL OF EXEMPTION AUTHORITY

Communication with respect to this document should be addressed to:

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NOTICE: ANY PERSON WHO WISHES TO SUPPORT OR OPPOSE THIS
APPLICATION SHOULD BY **DECEMBER 4, 2002** FILE AN ANSWER WITH THE
DEPARTMENT AND SERVE A COPY ON ALL PERSONS ON THE ATTACHED
SERVICE LIST.

November 19, 2002

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, D.C.**

Application of

Queen Air, Aeronaves Queen, S.A.

For Renewal of Exemption Authority to Engage
in Scheduled Air Transportation of Persons,
Property and Mail Pursuant to 49 U.S.C. §40109

(Dominican Republic-U.S. Scheduled Combination:

Docket OST-98-4601

APPLICATION FOR RENEWAL OF EXEMPTION AUTHORITY

Pursuant to the terms of 49 U.S.C. §§40109, 41301, and the Procedural and Economic Regulations of the Department of Transportation ("DOT") Queen Air, Aeronaves Queen, S.A. ("Queen Air") hereby applies for renewal of its exemption authority to conduct scheduled foreign air transportation of persons, property and mail from Santo Domingo, Dominican Republic, on the one hand, and the coterminal points San Juan, Puerto Rico; Miami, Florida; and New York, New York on the other hand, and to perform charters in accordance with Part 212 of the Department's rules.'

In support of this application, Queen Air states as follows:

In accordance with the FAA's LASA Program and its assessment of the Dominican Republic as a "Category 2" country, Queen Air would conduct these services only by wet leasing aircraft from a duly authorized and properly supervised U.S. or foreign air carrier.

**APPLICATION FOR
RENEWAL OF EXEMPTION AUTHORITY**

1. By Notice of Action Taken dated December 1, 1999, Queen Air was granted authority for one (1) year to conduct scheduled foreign air transportation of persons, property and mail on the routes set out above and charter operations in accordance with the Department's regulations. This authority was most recently renewed by Notice of Action Taken dated November 24, 2000 for a period of two (2) years, and therefore, set to expire by its own terms on November 24, 2002.² Queen Air requests that this authority be extended again for a further two (2) year period.

2. Queen Air currently holds authority from its homeland to operate between Santo Domingo, Dominican Republic, on the one hand, and the coterminal points San Juan, Puerto Rico; Miami, Florida; and New York, New York on the other hand.

3. Queen Air has successfully operated Dominican Republic - U.S. scheduled combination services utilizing modern, fuel-efficient equipment since December 1998 when it initiated operations. Queen Air is currently not operating to the U.S. Queen Air continues to be fit, willing, and able to operate the scheduled combination services referred to herein.

WHEREFORE, Queen Air, Aeronaves Queen, S.A. respectfully requests that the

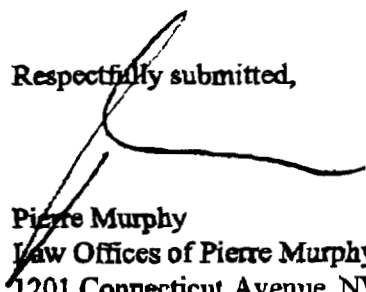
² Pursuant to 5 U.S.C. §558(c), as implemented by Part 377 of the Department's Regulations, Queen Air requests that the authority renewed by the November 24, 2000 Notice of Action Taken as indicated above remain in force until the disposition of this renewal application.

**APPLICATION FOR
RENEWAL OF EXEMPTION AUTHORITY**

Department renew its exemption authority to the extent necessary to enable it to continue to conduct scheduled foreign air transportation of persons, property and mail between Santo Domingo, Dominican Republic, on the one hand, **and** the coterminal points San Juan, Puerto Rico; Miami, Florida; and New York, New York on the other, and to conduct charters in accordance with the Department's regulations. In the alternative, Queen Air requests such other, further or different relief as the Department may deem necessary and proper.

November 19, 2002

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that I have on November 19, 2002 served via U.S. mail the foregoing Application of Queen Air, Aeronaves Queen, S.A. on the following persons:

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